

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

Amy Crum,

Plaintiff,

v.

United Financial Services LLC; and DOES 1-
10, inclusive,

Defendants.

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: Civil Action No.: 1:14-cv-00148-JTC
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**REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT
UNITED FINANCIAL SERVICES, LLC**

Plaintiff, Amy Crum (hereinafter “Plaintiff”), by and through Plaintiff’s counsel, hereby requests the Clerk of the Court enter default against Defendant United Financial Services LLC pursuant to Rule 55(a) of the Federal Rules of Civil Procedure (“FRCP”) on the grounds that Defendant has failed to answer this matter’s Complaint and has failed to appear or otherwise defend this action. Declaration of Sergei Lemberg ¶4.

Plaintiff served the Defendant with a summons and complaint on March 29, 2014, as evidenced by the proof of service on file with this Court. *Id.* ¶ 2. The Court has not granted Defendant extension of time to respond to the Complaint. *Id.* ¶ 3. On information and belief, the Defendant is neither an infant nor an incompetent person nor in the military service. *Id.* ¶¶ 5-6.

DATED: April 30, 2014

Respectfully submitted,

By /s/ Sergei Lemberg

Sergei Lemberg
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 30, 2014, a true and correct copy of the foregoing Request for Entry of Default and supporting declaration was served electronically by the U.S. District Court for the Western District of New York Electronic Document Filing System (ECF) and that the document is available on the ECF system. A copy of the foregoing was also mailed by first-class mail, postage prepaid to the parties listed below:

United Financial Services, LLC
4651 Roswell Road
Atlanta, GA 30342

/s/ Sergei Lemberg

Sergei Lemberg